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Attorneys for Defendant  
Sentinel Insurance Company

IN THE UNITED STATES DISTRICT COURT  
  
FOR THE DISTRICT OF OREGON  
  
PORTLAND DIVISION

AIRPORT CONCESSION CONSULTING  
SERVICES LLC, a limited liability  
company, and PATRICK GLEASON, an  
individual,

Civil No.

NOTICE OF REMOVAL

Plaintiffs,

v.

SENTINEL INSURANCE COMPANY,  
LTD., a foreign corporation,

Defendant.

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TO: The Clerk of the Court, United States District Court for the District of  
Oregon

Pursuant to 28 USC §1441 and 1446, Defendant Sentinel Insurance  
Company, Ltd. ("Sentinel") removes this action from the Circuit Court of the  
State of Oregon, for the County of Clackamas, to the United States District

Court for the District of Oregon in Portland, Oregon.

1. On or about September 26, 2017, Sentinel was served with a Summons and Complaint that had been filed in the Circuit Court of the State of Oregon, for the County of Clackamas, Case No. 17CV39930. Copies of the Summons and Complaint are attached hereto as Exhibits 1 and 2, respectively, and constitute all process, pleadings, and orders served on defendant in that action up to the present date.
2. Pursuant to 28 USC § 1441(a), a party may remove an action filed in the state court to the United States District Court if the district court has original jurisdiction over the action. This action is one over which the court has original jurisdiction under 28 USC § 1332(a)(1) because:
  - (1) The amount in controversy exceeds \$75,000; and
  - (2) Plaintiff and Defendant are citizens of different states and Defendant is not a citizen of the state in which the action was brought.

Defendant Sentinel Insurance Company, Ltd. is organized and incorporated under the laws of the state of Indiana with its principal place of business in Connecticut.

3. The amount in controversy in this action exceeds \$75,000 in that Plaintiff seeks, among other things, \$142,500 in damages.
4. Removal is timely in that fewer than 30 days have elapsed since a copy of the Summons and Complaint was first provided to Sentinel 28 USC § 1446(b).

5. This notice is filed pursuant to Fed.R.Civ.P. 11.

WHEREFORE, Sentinel removes this action from the Circuit Court for the State of Oregon, for the County of Clackamas to the Portland Division of the United States District Court, for the District of Oregon.

DATED: October 20, 2017

MALONEY LAUERSDORF REINER, PC

By /s/ Francis J. Maloney

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